

MICHAELE N. TURNAGE YOUNG*
DANIEL HARAWA
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th Street NW, Suite 600
Washington, DC 20005
Tel: (202) 682-1300
Fax: (202) 682-1312
MTURNAGEYOUNG@NAACPLDF.ORG
*Counsel of record, CA Bar No. 247796

SHERRILYN A. IFILL
PRESIDENT & DIRECTOR-COUNSEL
JANAI S. NELSON
SAMUEL SPITAL
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
Tel: (212) 965-2200
Fax: (212) 226-7592

Counsel for Amicus Curiae NAACP Legal Defense and Educational Fund, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO-OAKLAND DIVISION**

SIERRA CLUB and SOUTHERN BORDER
COMMUNITIES COALITION,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity; PATRICK M.
SHANAHAN, Acting Secretary of Defense, in
his official capacity; KIRSTJEN M. NIELSEN,
Secretary of Homeland Security, in her official
capacity; and STEVEN MNUCHIN, Secretary
of the Treasury, in his official capacity,

Defendants.

Case No.: 4:19-cv-00892-HSG

**UNOPPOSED MOTION FOR LEAVE
TO FILE AMICUS BRIEF IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

1 The NAACP Legal Defense and Educational Fund, Inc. (“LDF”) moves for leave to file
2 the attached amicus brief in support of the *Sierra Club* Plaintiffs’ motion for partial summary
3 judgment. This case raises issues of national importance concerning the rule of law in our
4 constitutional democracy. LDF respectfully submits that its long history of relying on the rule of
5 law to challenge discrimination and advance civil rights gives it a unique perspective that will
6 assist the Court in considering these issues. The Government and Plaintiffs have consented to
7 this filing.

8 For the foregoing reasons, LDF respectfully requests that this Court grant its motion for
9 leave to file an amicus brief.

10 Dated: October 18, 2019

11 Respectfully Submitted,

12 s/ Michael N. Turnage Young

13 Michael N. Turnage Young
14 *Counsel of record*
Daniel S. Harawa
15 *Of counsel*
NAACP Legal Defense and
Educational Fund, Inc.
16 700 14th St. NW, Suite 600
Washington, DC 20005
17 Tel: (202) 682-1300
mturnageyoung@naacpldf.org

18 Sherrilyn A. Ifill
19 *President & Director-Counsel*
Janai S. Nelson
20 Samuel Spital
NAACP Legal Defense and
21 Educational Fund, Inc.
40 Rector St. 5th Floor
22 New York, NY 10006
Tel: (212) 965-2200